

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

HERITAGE REALTY MANAGEMENT, INC.,)	Case No. CA 04 - 333 ERIE
)	
Plaintiff)	Judge Sean McLaughlin
)	
v.)	
)	
JOHN ALLIN d/b/a ALLIN COMPANIES,)	
Defendant)	TRIAL BY JURY OF 12 DEMANDED

AFFIDAVIT OF Chester Zelgowski

COMMONWEALTH OF PENNSYLVANIA)
) ss.
COUNTY OF ERIE)

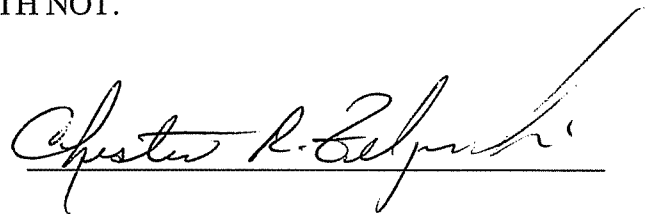
1. In 2004, I was employed by Mr. John Allin, d/b/a Snow Management Group.
2. As part of my job duties with Snow Management Group, I participated and engaged in work which was required of Snow Management Group in order to be ready and able to perform the snow and ice removal work under the contract with Heritage Realty Management, Inc.

3. The work which I performed with regard to the Heritage contract included the following: Worked with Field Managers to confirm pricing on each site alongwith accuracy for specific equipment on all sites in order to meet margin on the account.

EXHIBIT
J

4. I have carefully reviewed the detailed itemization listing the costs and the time which was expended by Snow Management Group on the Heritage contract. This itemization is attached hereto as Exhibit A. To the best of my knowledge, information and belief, the amount of time and the nature of the work which is identified in this itemization as being work which I performed and time which I spent in connection with the Heritage contract is correct and accurate.

FURTHER THE AFFIANT SAYETH NOT.

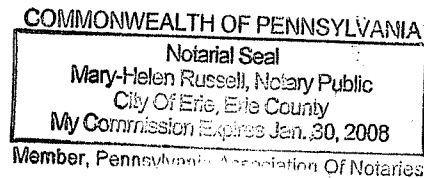
A handwritten signature in cursive script, reading "Chester R. Zepher", is written over a horizontal line.

COMMONWEALTH OF PENNSYLVANIA)
 : SS.
COUNTY OF ERIE)

ON THIS, the 10 day of May, 2006, before me a
Notary Public, the undersigned officer, personally appeared CHESTER ZELGOWSKI,
known to me (or satisfactorily proven) to be the person whose name is subscribed to the within
instrument, and acknowledged that he/she executed the same for the purposes therein contained.

IN WITNESS WHEREOF, I hereunto set my hand and official seal.

Mary Helen Russell



Expense	Date Incurred	Date Paid	Entity Paid	Amount of Expense	Affiliation Allin Co/SMG	COMMENTS
JV Travel expenses						
Brian Marshall Travel expenses						
Peggy Allin - Interviews						
Airfare	8/23/2004		Sun Country Airlines	\$129.10	same	
Hotel	8/23/2004	8/25/2004	Courtyard Minneapolis-St. Paul Airp	\$149.00+Tax	same	
Airfare	8/25/2004		Northwest Airlines	\$364.69	same	
Meals 08/23/04-0825/04	10/18-10/23		various	\$ 25.00 per diem x 3	same	
Airfare	10/18/2004		United Airlines	\$1,037.60	same	
Hotel	10/20/2004	10/20/2004	Comfort Inn - Denver	\$ 64.99 + tax	same	
Hotel	10/21/2004	10/21/2004	Fairfield Inn & Suites - Minn/St. Paul	\$ 82.01 + tax	same	
Taxi	10/22/2004			\$15.00	same	
Hotel	10/22/2004		Radisson Hotel - Des Moines IA	\$ 99.00 + tax	same	
Meals 10/18-10/23	10/18-10/23		various	\$ 25.00 per diem x 6	same	
Erie to Cleveland	10/25/2004	10/25/2004	Anderson Airlink	\$25.00	same	
Cleveland to Chicago	10/25/2004		Continental	\$64.90	same	
Hotel	10/25/2004	10/25/2004	Fairfield Inn Chicago	119.00+tax	same	* Had a \$95.80 ecredit
Ground trans. Cleveland to Erie	10/26/2004		John Allin	unknown	same	personal or company?
Duane Haataja Travel						
Ground Transportation	11/1/2004		ATA	\$181.70	new hire	
Hotel 11/1/04 - 11/6/04	11/1/2004		(picked up from Pitts. Airport		new hire	PJ Short picked up
training 11/2 - 11/4/04	11/2 - 11/4/04		El Patio Motel	\$ 44.00 x 5 nights	new hire	training @SMG
Bryan Rohe Travel						
Transportation from Cleve - Erie	10/31/2004		ATA/Southwest	\$221.70	new hire	trans fr hotel to SMG
Hotel 10/31/04 - 11/4/04	10/31/2004		Anderson Airlink	\$25.00	new hire	roomed w/ D Dziuban
training 11/2/04 - 11/4/04	11/2/04 - 11/4/04			0	new hire	training @ SMG
David Dziuban Travel						
Transportation from Cleve - Erie	10/31/2004		Southwest	\$102.60	new hire	
Hotel 10/31/04 - 11/4/04	10/31/2004		Anderson Airlink	\$20.00	new hire	trans fr hotel to SMG
training 11/2/04 - 11/4/04	11/2/04 - 11/4/04			\$ 44.00 x 5 nights	new hire	training @SMG
Legal Council						
Supplies						
Labels				\$ 135.00	SMG	1075 PACKETS - RFP TO SVC PROVIDERS
Business Envelopes				\$ 110.00	SMG	1075 PACKETS - RFP TO SVC PROVIDERS
Manilla Envelopes				\$ 65.00	SMG	1075 PACKETS - RFP TO SVC PROVIDERS
Paper				\$ 78.00	SMG	1075 PACKETS - RFP TO SVC PROVIDERS
Postage				\$ 1,386.75	SMG	1075 PACKETS - RFP TO SVC PROVIDERS
Copy Count				\$ 537.50	SMG	1075 PACKETS - RFP TO SVC PROVIDERS
Faxing				\$ 125.00	SMG	1075 PACKETS - RFP TO SVC PROVIDERS
Personnel						
sites entered in system				\$ 180.00	ops-audit - Beth	4 hours at \$ 45 per
sites entered in system				\$ 180.00	ops-admin - Tina	4 hours at \$ 45 per
phone calls				\$ 1,080.00	ops-audit - Beth	24 hours at \$45 per

phone calls	\$	1,080.00	ops-admin - Linda	24 hours at \$45 per
phone calls	\$	1,080.00	ops-admin - Stacey	24 hours at \$45 per
phone calls	\$	1,080.00	ops-admin - Tina	24 hours at \$45 per
rfp data entry	\$	360.00	ops-admin - Linda	8 hours at \$ 45 per
rfp data entry	\$	6,175.00	ops mgr - L. Edwards	65 hours @ \$ 95 per
Regional Manager-SPs, Site Reviews, Budgeting	\$	3,800.00	rm - Smallwood	40 hours @ \$95 per
Field manager-SPs, Site Reivews	\$	760.00	fm - J Casey	8 hours at \$95 per
Field manager-SPs, Site Reivews	\$	950.00	fm - J. terrance	10 hours at \$95 per
Regional Manager-SPs, Site Reviews, Budgeting	\$	9,500.00	rm - R Hrovat	100 hours at \$95 per
Regional Manager-SPs, Site Reviews, Budgeting	\$	9,500.00	fm - R Santoro	100 hours at \$95 per
Production-Site Visits, Production Maps	\$	2,375.00	prod coord- D. Gallagher	25 hours at \$95 per
Production-Production Maps & Binders	\$	9,000.00	prod - T. Pancura	200 hours at \$45 per
Production-Number Calculations	\$	5,200.00	prod - C. Zelgowski	80 hours at \$65 per
Production-SPs, Field Mangers, Training, Budgeting	\$	3,800.00	prod - R. Rieder	40 hours at \$95 per
Special Accounts Manager-Estimating, Point of Contact Info., Training	\$	9,500.00	sac - B. Marshall	100 hours at \$95 per
Bus. Development	\$	33,000.00	bus devel - J Vernon	200 hours at \$165 per
Bus. Development	\$	22,500.00	bus devel - J Allin	100 hours at \$225 per
Human Resources	\$	45,000.00	h.r. - P Allin	200 hours at \$225 per
Accounting	\$	1,140.00	accounting - M Suleski	12 hours at \$95 per
new hire -field manager	\$	9,500.00	Dave Dziuban - Chicago	100 hours at \$95 per
new hire -field manager	\$	9,500.00	Bryan Fole - Des Moines	100 hours at \$95 per
new hire -field manager	\$	9,500.00	Diane Kataja-Minneapolis	100 hours at \$95 per

Expense	Date Incurred	Date Paid	Entity Paid	Amount of Expense	Affiliation to Allin Co/SMG	COMMENTS
Flight to Ft. Lauderdale-John Allin	1/21/2004	1/21/2004	Northwest Airlines	233.9	same	
Flight to Ft. Lauderdale-Jeff Vernon	1/21/2004	1/21/2004	Northwest Airlines	207.9	same	
Ground Transportation	2/22/2004	2/22/2004			same	
Hotel -JA & JV	2/22/2004	2/22/2004	Harbor Beach Resort & Spa Mariott	\$0	same	\$319.00 paid by Heritage

John Allin		
Date	Tasks	Hours
2/18/2004	Preparation of presentation in FL	10
02/22-02/24/04	Trip to present SMG to Heritage	48
04/15-04/27/04	gather update info from Jeff, Brian, Rudy & Chet	4
06/07-06/09/04	Work with Brian & Jeff to align pricing	8
08/19-08/26/04	Correspondence with SP's in MN to do sites	2
09/30-10/04/04	Review & amend contract & SP Agreement	8
10/8-10/09/04	Review & initial revised contract	2
10/26-10/28/04	Several meetings on training of new FM's & contacting all Property Mgr's	8
10/29-11/04/04	Finalize & approve all FM's responsibilities for all sites & corresponding Property Mgr's	10
		100
Jeff Vernon		
Date	Tasks	Hours
02/16-02/19/04	Preparation of presentation in FL	20
02/22-02/24/04	Trip to present SMG to Heritage	48
5/23/2004	Meeting w/Bob P in Las Vegas - negotiations	2
06/07-06/09/04	Work with John & Brian to align pricing	10
6/16/2004	Trip to Boston w/Mike Smallwood to meet with Bob P	8
9/20/2004	Trip to Rutland, VT to measure site and get SP	16
8/2/2004	Conference Call Heritage/SMG - moving forward	2
08/03-08/05/04	Follow up work from conference call - due diligence	10
10/4-10/09/04	Travel to Erie to work with Production Crew to complete sites, equipment, SP's, maps, etc.	60
10/11-10/15/04	Working on bid sheets, sites, SP's, production, equipment	10
10/21-10/22/04	Meetings in Erie - finalize info for RFPS to go out	4
10/29-11/04/04	Finalize & approve all FM's responsibilities for all sites & corresponding Property Mgr's	10
		200

Expense	AMOUNT	TOTAL
AIRFARE	\$ 129.10	
	\$ 364.69	
	\$ 1,037.60	
	\$ 64.90	
	\$ 181.70	
	\$ 221.70	
	\$ 102.60	\$ 2,102.29
HOTEL	\$ 149.00	
	\$ 64.99	
	\$ 82.01	
	\$ 99.00	
	\$ 220.00	
	\$ 220.00	\$ 835.00
FOOD	\$ 75.00	
	\$ 150.00	
	\$ 125.00	
	\$ 125.00	
	\$ 125.00	\$ 600.00
GROUND	\$ 25.00	
	\$ 20.00	
	\$ 25.00	\$ 70.00
TRANSP. TOTAL	\$ 2,102.29	\$ 3,478.19
LABELS	\$ 135.00	\$ 135.00
ENV	\$ 110.00	
	\$ 65.00	\$ 175.00
PAPER	\$ 78.00	\$ 78.00
POSTAGE	\$ 1,386.75	\$ 1,386.75
COPIES	\$ 537.50	\$ 537.50
FAXING	\$ 125.00	\$ 125.00
SITE DATA ENTRY	\$ 180.00	
	\$ 180.00	\$ 360.00
PHONE CALLS	\$ 1,080.00	
	\$ 1,080.00	
	\$ 1,080.00	
	\$ 1,080.00	\$ 4,320.00
RFP DATA ENTRY	\$ 360.00	
	\$ 6,175.00	\$ 6,535.00
MGMT/PRODUCTION	\$ 3,800.00	
	\$ 760.00	
	\$ 950.00	
	\$ 9,500.00	
	\$ 9,500.00	
	\$ 2,375.00	
	\$ 9,000.00	
	\$ 5,200.00	
	\$ 3,800.00	
	\$ 9,500.00	
	\$ 33,000.00	
	\$ 22,500.00	
	\$ 45,000.00	
	\$ 1,140.00	
	\$ 9,500.00	
	\$ 9,500.00	
	\$ 9,500.00	\$ 184,525.00
SUPPLIES/PERSONNEL TOTAL		\$ 198,177.25
GRAND TOTAL		\$ 201,655.44